

The parties shall notify the Court by February 1, 2023 whether the granting of this extension request necessitates an adjournment of the conference currently scheduled for Friday, February 3, 2023.

## COVINGTON

BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG  
LONDON LOS ANGELES NEW YORK PALO ALTO  
SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

APPLICATION GRANTED  
SO ORDERED 

VERNON S. BRODERICK  
U.S.D.J. 1/31/23

By ECF

January 30, 2023

Hon. Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Paschal, 21 Crim. 331 (VSB)**

Dear Judge Broderick:

I represent Defendant Michael Paschal in the above-captioned action. The parties respectfully request a two-week extension to the motions schedule, as the parties need additional time to negotiate a potential plea disposition. Defense counsel and the Government have conferred regarding this matter, and the parties jointly propose the following revised motions schedule for the Court's approval, if Defendant chooses to file the motion to suppress:

- By February 13, 2023: Defendant will file his motion to suppress;
- By February 27, 2023: Government files response to Defendant's motion to suppress;
- By March 6, 2023: Defendant files reply to United States' response to Defendant's motion to suppress.

Defendant's current deadline to file his motion to suppress, if he so chooses, is January 30, 2023. No previous requests for extensions of time have been made. I have been informed by AUSA Kevin Mead that the Government consents to this request.

Sincerely,

Arlo Devlin-Brown

Counsel for Michael Paschal

cc: Kevin Mead, Assistant United States Attorney